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February 25, 2020

Hon. Peter G. Sheridan, U.S.D.J.
United States District Court, District of New Jersey
402 East State Street
Trenton, NJ 08608

Re: Lasry v. JP Morgan Chase & Co., Case No. 3:18-cv-09776-PGS-DEA

Dear Judge Sheridan:

I am Of Counsel to M. Harvey Rephen & Associates, P.C., attorneys for Plaintiff Malka Lasry in the above matter. I am writing in response to your order dated February 13, 2020, directing the parties to brief the issues of whether: (1) this Court has jurisdiction over Mark Harvey Rephen and the Rephen Firm; (2) the scope of Mr. Geller's "Of Counsel" designation; and the applicability of Federal Rule of Civil Procedure 11's requirements.

I only learned of this order on Monday, February 24, 2020, when I read Defendant's Brief in Response to the Court's February 13, 2020 Order Directing Additional Briefing. That Brief was filed at 11:48 P.M. on Friday, February 21st. I never received a message from ECF regarding the Court's February 13th order. If I had, I certainly would not have ignored it. As a result, I am requesting the Court to allow me one week to submit a brief in response to the February 13th order.

Yesterday I spoke with Amisha Patel, Esq., one of the attorneys for Defendant, about my application to see if she would consent to it. She responded later in the day that her client would not allow her to consent, but asked that if the Court should be gracious enough to grant my application that Defendant be granted time to respond to my brief, since I have already read Defendant's brief.

Thank you for your consideration and attention to this matter.

Very truly yours,


Edward B. Geller

EBG/pw